

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TERRANCE JOHNSON, et al.,

Plaintiffs,

vs.

CARPENTERS OF WESTERN
WASHINGTON BOARD OF TRUSTEES, et
al.,

Defendants.

NO. 2:22-cv-01079-JCC

**STIPULATED MOTION TO EXTEND
TIME ON DEADLINE FOR BOARD
DEFENDANTS TO FILE REPLY IN
SUPPORT OF MOTION TO DISMISS
AND TO EXTEND CONSIDERATION
DATE AND ~~PROPOSED~~ ORDER**

**NOTED FOR MOTION ON:
MARCH 2, 2023**

STIPULATED MOTION
TO EXTEND TIME - 1
NO. 2:22-cv-01079-JCC

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Defendants Carpenters of Western Washington Board of Trustees, Gerald Auvil, Noe Castillo, Ken Ervin, Jeff Foushee, Kurt Hildebrand, Steve Hoffmann, Martin Holberg, Dan Hutchins, Ryan Hyke, Andrew Ledbetter, Ron Montoya, Tim O'Neill, Jim Osborne, Doug Peterson, Rick Poitras, Danny Robins, Evelyn Shapiro, Bob Susee, Jeff Thorson, Doug Tweedy, and Wilf Wainhouse (collectively, the "Board Defendants"), and Plaintiffs Terrance Johnson, Brent Yahraus, and Jacy Purkiss, by and through their undersigned counsel, stipulate to extend the due date for the Board Defendants' Reply in support of their Motion to Dismiss from March 7, 2023 to March 21, 2023, and to extend the date of the Court's consideration of said Motion from March 10, 2023 to March 24, 2023.

WHEREAS, on December 1, 2022, this Court entered its Minute Order setting the briefing schedules for Defendants' Motions to Dismiss. *See* Dkt. No. 110 ("Defendants' Replies in Support of Their Motions to Dismiss (if any) are due March 7, 2023.").

WHEREAS, Counsel for Board Defendants are experiencing a "true, unforeseen emergency" regarding health and safety issues relating to COVID-19.

WHEREAS, on February 28, 2023, counsel for Board Defendants and Plaintiffs conferred and agreed to extend the deadline on Board Defendants' Reply and the Court's consideration of said Motion in light of Board Defendants' counsels' health and safety issues relating to COVID-19. *See* LCR 7(j).

WHEREAS, this requested extension of time will not affect any other deadlines in this case.

NOW THEREFORE, the Parties respectfully request that the Court extend the due date for the Board Defendants' Reply in support of their Motion to Dismiss from March 7, 2023 to March 21, 2023, and to extend the date of the Court's consideration of said Motion from March 10, 2023 to March 24, 2023.

STIPULATED MOTION
TO EXTEND TIME - 2
NO. 2:22-cv-01079-JCC

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1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD on this 2nd day of
2 March, 2023.

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4 THOMPSON & THOMSON LLC

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11 *Counsel for Plaintiffs Terrance Johnson, Brent*
12 *Yahraus, and Jacy Purkiss, individually and as*
13 *the representatives of a class of similarly*
14 *situated persons, and on behalf of the*
15 *Carpenters of Western Washington Individual*
16 *Account Pension Plan and the Carpenters*
17 *Retirement Plan of Western Washington*

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AND

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STIPULATED MOTION
TO EXTEND TIME - 3
NO. 2:22-cv-01079-JCC

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6 *Western Washington Board of Trustees,*
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10 *Andrew Ledbetter, Ron Montoya, Tim*
11 *O'Neill, Jimmy Osborne, Doug Peterson,*
12 *Rick Poitras, Danny Robins, Evelyn Shapiro-*
13 *O'Connor, Bob Susee, Jeff Thorson, Doug*
14 *Tweedy, and Wilf Wainhouse*

15 **[PROPOSED] ORDER**

16 Based on the foregoing stipulated motion of the parties, therefore, IT IS HEREBY
17 ORDERED THAT the due date for the Board Defendants' Reply in support of their Motion to
18 Dismiss is extended from March 7, 2023 to March 21, 2023, and the date of the Court's
19 consideration of said Motion is extended from March 10, 2023 to March 24, 2023.

20 IT IS SO ORDERED.

21 DATED this 3rd day of March 2023.

22 

23 The Honorable John C. Coughenour
24 United States Senior District Judge
25

26 STIPULATED MOTION
TO EXTEND TIME - 4
NO. 2:22-cv-01079-JCC

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